



Littler Mendelson, PC
900 Third Avenue
New York, NY 10022.3298

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Christine L. Hogan
212.583.2676 direct
212.583.9600 main
212.898.1116 fax
clhogan@littler.com

**VIA ECF & FACSIMILE
(718) 613-2365**

Magistrate Judge Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Marin et al. v. Apple-Metro, Inc. et al.*
Civil Action No. 12-cv-05274

Dove et al. v. Apple-Metro, Inc. et al.
Civil Action No. 13-cv-01417

Dear Magistrate Pollak:

My firm represents the Defendants in the above-referenced cases. During the May 5, 2015 evidentiary hearing, Your Honor set a briefing schedule on the question of whether the Court should permit individuals who filed consent forms after April 20, 2015 to opt into the *Marin* and *Dove* cases. In the spirit of compromise and to avoid further motion practice, Defendants will agree to allow late opt-in notices up to and including May 20, 2015. Accordingly, we do not believe that motion practice is necessary. If Plaintiffs file consent forms after May 20th, the parties can revisit the issue then, if necessary.

Finally, please note that regardless of the above offer, Defendants continue to be strongly opposed to Plaintiffs' request to extend the opt-in period for current and former employees or to post the FLSA Notice at its restaurants for any additional period of time.

Thank you.

Respectfully submitted,

Christine L. Hogan

cc: Plaintiffs' Counsel (via ECF)